

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA)	Criminal No. 2:05cr
)	
v.)	18 U.S.C. §§ 371, 201(c)(1)(a)
)	Conspiracy to Pay Illegal
STEPHEN D. WILEY)	Gratuities

CRIMINAL INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about August 2003 and continuing to in or about August 2004 in the Eastern District of Virginia, STEPHEN D. WILEY, the defendant herein, unlawfully and knowingly combined, conspired and agreed with other unindicted conspirators to commit the following offense against the United States, to-wit: knowingly, otherwise than as provided by law for the proper discharge of official duty, did directly and indirectly give, offer, and promise a thing of value to a public official for or because of official acts performed or to be performed by such public official in violation of Title 18, United States Code, Section 201(c)(1)(A).

OVERT ACTS

In furtherance of the conspiracy and to engage in conduct in furtherance of said offense, the following overt acts among others, were committed in the Eastern District of Virginia:

From in or about August 2003 and continuing through in or about August 2004, STEPHEN D. WILEY, did knowingly agree to the payment of approximately 41 separate cash payments to a public official, acting on behalf of the United States while employed at Norfolk Naval Shipyard, Portsmouth, Virginia. Each payment ranged from \$1,000 to \$4,600. The payments were made in exchange for and in agreement with the public official for the award of past and future bills of lading for freight shipments from the Norfolk Naval Shipyard. The payments to the public official totaled approximately \$76,000.

(In violation of Title 18, United States Code, Sections 371).

Paul J. McNulty
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